R07-19-C-001

CITY OF FORT DODGE
Business Affairs & Community Growth

Narrative Information Sheet

IV.D.1. Applicant Identification

City of Fort Dodge
819 1st Avenue South
Fort Dodge, IA 50501

IV.D.2. Funding Requested

a. Grant Type

Single Site Cleanup

b. Federal Funds Requested

$500,000
Fort Dodge is not requesting a cost share waiver

c. Contamination

Hazardous Substances

IV.D.3. Location

908 1st Avenue South
Fort Dodge, IA 50501

IV.D.4. Property Information for Site-specific Proposals

Wahkonsa Annex
908 1st Avenue South
Fort Dodge, IA 50501

IV.D.5. Contacts

IV.D.5.a. Project Director

Vickie L. Reeck
Community & Economic Development Director
819 1st Avenue South
Fort Dodge, IA 50501
(515) 576-4551, extension 1243
vreeck@fortdodgeiowa.org

IV.D.5.b. Chief Executive/Highest Ranking Elected Official

Matt Bemrich, Mayor
819 1st Avenue South
Fort Dodge, IA 50501
(515) 576-4551
mbemrich@fortdodgeiowa.org

IV.D.6. Population

24,305 (U.S. Census Estimate, 2017)

IV.D.7. Other Factors Checklist

Other Factors	Page #
Community population is 10,000 or less.	N/A
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The proposed brownfield site(s) is impacted by mine-scarred land.	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/redevelopment; secured resource is identified in the Narrative and substantiated in the attached documentation.	N/A
The proposed site(s) is adjacent to a body of water (i.e., the border of the site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	N/A
The proposed site(s) is in a federally designated flood plain.	N/A
The redevelopment of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	N/A

IV.D.8. Letter from the State or Tribal Environmental Authority

IOWA DEPARTMENT OF NATURAL RESOURCES

GOVERNOR KIM REYNOLDS
LT. GOVERNOR ADAM GREGG
ACTING DIRECTOR BRUCE TRAUTMAN

January 28, 2019

Vickie Reeck
Community & Economic Development Director
City of Fort Dodge
819 1st Ave South
Fort Dodge, Iowa 50501

RE: City of Fort Dodge, Iowa – Brownfield Cleanup Grant Application

Dear Vickie:

This letter is submitted as a statement of acknowledgement and review, as well as our partnership and support, for the City of Fort Dodge's brownfield site-specific cleanup grant application in the amount of $500,000, through funding authorized by §104(k) of CERCLA. This application is designed to address the cleanup of hazardous materials, primarily regulated, asbestos containing material (ACM) within a large, abandoned hotel in downtown Fort Dodge, formerly known as the Wahkonsa Hotel.

The neglect and abandonment of this 8-story structure by former owners, as well as environmental regulatory issues associated with addressing asbestos materials that would be required for renovation or demolition of this hotel, built in 1914, has hindered interest by any private entities or developers, leaving the community with no choice but to protect the public's health and community character by having the City take title to the site through legal, abandonment clauses in Iowa Law.

With ownership of the building, the City has provided physical security for the property, and seeks to demolish the building to not only remediate the environmental hazard that the asbestos materials would cause from further decay, but with the end-goal of a quality redevelopment of the site; the city plans to use a major portion of this site for construction of an intermodal public and private transportation hub and parking ramp, designed to bring people to downtown Fort Dodge, thus reinvigorating the City's core. This will help to not only cleanup a brownfield site, but will stimulate one of the largest public improvements and redevelopment initiatives for quality of life that downtown Fort Dodge has seen in decades.

The Iowa Department of Natural Resources (IDNR) has worked closely with the City of Fort Dodge on brownfield planning and technical assistance related to this site and neighboring properties through our Brownfield State Response Section 128(a) Program; however, the daunting task of asbestos and hazardous substance remediation within an 8-story, 100+ year old building will require significant investment, beyond the dedicated resources that both the IDNR and the City have already put forward on this and related downtown brownfield projects.

The IDNR appreciates the opportunity to be a supportive partner for brownfield assessment, cleanup, and redevelopment projects in the past in Fort Dodge, and we support the brownfield cleanup strategies presented in this application with the highest degree of endorsement and confidence.

Sincerely,

Mr. Mel Pins
Executive Officer
Iowa Brownfield Redevelopment Program

WALLACE BUILDING, 502 E 9TH ST, DES MOINES IA 50319
Phone: 515-725-8200 www.IowaDNR.gov Fax: 515-725-8202

Narrative / Ranking Criteria for Cleanup Grants (100 pts.)

IV.E.1 Project Area Description and Plans for Revitalization (30 pts.)

IV.E.1.a Target Area and Brownfields (8 pts.)

IV.E.1.a.i Background and Description of Target Area (3 pts.)

The City of Fort Dodge (City) is located in north central Iowa at the crossroads of US Highways 20 and 169. The town of approximately 25,000 (2015 US Census Data), residents, which is the largest in a 60-mile radius, is its own economic hub and a regional center for manufacturing, transportation and healthcare services. Nearly 1,500 citizens reside downtown, and several thousand more workers commute in on a daily basis, making redevelopment of the city center a high priority. What was once a prosperous and growing City due to thriving mining community underwent rampant disinvestment and population decline starting in the mid-1970s. Few downtown businesses were able to sustain themselves over the years. More than twenty multi-story structures that once housed mixed-use retail and residential were abandoned. Residents and businesses relocated to the edges of the City, leaving shells of buildings sitting vacant with the Wahkonsa Annex Building (Wahkonsa Annex) situated in the center of downtown. Over the past 5 years, a noticeable shift has occurred. Residents are beginning to show a sense of pride in their downtown. Multiple new businesses have appeared, and more citizens are interested in living a walkable, downtown lifestyle. This has spurred the City to directly confront their brownfield challenges with the goal to establish a new city center complete with residential, commercial and civic aspects.

IV.E.1.a.ii Description of the Brownfield Site(s) (5 pts.)

The City of Fort Dodge is putting together a game changing project. What was once one of the largest hotel complexes west of the Mississippi River, the Wahkonsa Annex has become one of the largest and most dangerous brownfield sites in all of Iowa. The City is ready to invest in its future and that simply cannot occur without a massive investment from multiple stakeholders. This site vision includes a new Intermodal Hub that will support several planning initiatives and economic revitalization strategies for the downtown and the region. This will undoubtedly spur dozens of additional redevelopment projects due to its massive investment. Adjacent to the north, the Wahkonsa Hotel was built in 1910 as a first-class hotel to serve the growing industrial city. Subsequently, the Wahkonsa Annex, designed similar in style to the original hotel, expanded the hotel facility as the demand for expanded lodging for business travelers and vacationers increased. Construction of the four-story Annex was completed in 1917 with another three stories added in 1919 for a total square footage of over 134,000.

When it became evident that this property needed to be redeveloped in order to establish a revitalized downtown core, the City acquired it and began planning for environmental remediation. This started with a comprehensive survey of all building materials. The survey followed appropriate OSHA Regulation 1926.1101 and 40 CFR Part 61 – National Emission Standards for Hazardous Air Pollutants (NESHAPs). A total of 454 building materials were analyzed for asbestos, of which 105 tested positive. Asbestos containing materials included thousands of feet of damaged friable pipe insulation, ceiling texture, drywall joint compound, floor tile, mastics and numerous other building materials. The massive building has numerous entrances and dozens of broken windows, thus presenting significant potential exposure pathways to the general public and a challenge for City staff to keep children and other intruders out.

IV.E.1.b Revitalization of the Target Area (12 pts.)

IV.E.1.b.i Redevelopment Strategy and Alignment with Revitalization Plans (7 pts.)

Although this immense brownfield property has presented its fair share of issues for the City, it now presents an opportunity. This opportunity is to create a sense of place for residents and more importantly, to fulfill the economic improvement needs of Fort Dodge that aligns well with local government land use and master plans. Several of the goals established within the City's most recent *Comprehensive Plan* (2016) include: promoting optimal health and well-being for the entire community and promoting a well-planned community with balanced land uses. The timing of this grant opportunity is ideal for Fort Dodge.

The need and desire for additional affordable housing as well as bolstering the tax base within the target area is evident. This was validated in the *Existing Conditions Report* completed in April of 2015 which revealed a need for a wide variety of housing including: single family, townhomes, multi-family and adaptive reuse. It was also confirmed during visioning sessions with City staff and civic leaders throughout the community during the Comprehensive Plan process. Existing conditions include significant improvements in the number of trail miles and improve the aesthetics of the 5th Avenue South corridor. Local business owners had identified the City's overall "quality of life" as a deterrent to employee recruitment. Threats to the City's quality of life include a lack of housing options, as stated previously, as well as the perception of safety against violent crime and the availability of recreational opportunities and entertainment options. As Fort Dodge is essentially its own economic hub, the need for commercial redevelopment with recreational and entertainment options is at an all-time high.

Fort Dodge has received major commitments from multiple developers to begin the downtown transformation. The Former Warden Hotel, a 155,000 SF abandoned structure adjacent to the Wahkonsa Annex to the west, will be transformed into market rate housing with commercial store front on the main floor. This $30 million investment by KDG LLC of Kansas City will create 120 apartments on the upper floors with much needed retail space on the first two floors. Construction is slated to begin in 2019. The City has also committed to a new Recreation-Healthy Life Center (REC) that will be located across the street on 1st Avenue South, which has created a significant need in this immediate area for parking. The dilapidated nature of the Wahkonsa Annex and impossible budget for renovation made this an ideal location for the Intermodal Hub in this redevelopment area. The 500-stall Intermodal Hub will connect the redeveloped Warden Plaza Building located to the west with the Recreation-Healthy Life Center located to the east, providing much needed parking for these multi-use facilities. The Intermodal Hub will span over South 10th Street accommodating sheltered drop off and pick up for the City's bus service and for the Recreation-Healthy Life Center. This five-story Hub will also provide additional parking for downtown businesses and serve as the central location for a community-wide bike-share system. The Intermodal Hub will also allow access to both bicycle and vehicle electric charging stations. Therefore, before the Intermodal Hub can begin to take shape the removal of all asbestos and hazardous materials is imperative prior to the structure's demolition.

IV.E.1.b.ii Outcomes and Benefits of Redevelopment Strategy (5 pts.)

The positive impacts of brownfield redevelopment within a downtown district regarding environmental, economic and social effects are immense. The Intermodal Hub is projected to reduce the number of vehicle miles traveled each year by a staggering 686,017 miles. That reduction of vehicle miles traveled will translate into longer lasting pavements, longer lasting vehicles, and less fuel consumption, which puts money back into the pockets of drivers. It will also provide multiple modes of transportation options for residents and visitors in the Fort Dodge region through public transit, bicycle parking, a bike-share dock, and metered vehicle parking. As a park-and-ride and dispatch location for Dodger Area Rapid Transit (DART), the Intermodal Hub is expected to increase the use of public transit for employees throughout the City of Fort Dodge, as well as industrial commuters within Hamilton, Humboldt, Wright, and Webster Counties. Students enrolled at Iowa Central Community College (located SW of downtown), residents of Warden Plaza, business patrons, and hospital patients across the city will all benefit from the immediate parking availability at a major transit stop.

The Intermodal Hub investment will support over 300 construction jobs, 3,000 industrial jobs in the region through the Park 'n Ride facility, nearly 60 full-time retail jobs in the Warden and the REC, and numerous office jobs in the downtown by expanding available parking. It will also promote healthier living through the Bike-Share and bike racks as well as supporting the REC with parking and will support other local business in the downtown core with additional parking capacity, such as the funeral home located across the street to the south. The redevelopment will also contribute greatly to improving the quality of life for the residents of the area.

IV.E.1.c Strategy for Leveraging Resources (10 pts.)

IV.E.1.c.i Resources Needed for Site Reuse (7 pts.)

The City's $30 million commitment from KDG, LLC to transform the adjacent building into market rate housing is the exact spark the City needs for this project area. This commitment will be utilizing financing from City Incentives, Federal and State Historic Tax Credits, Iowa Brownfield Tax Credits, Workforce Housing Tax Credits, New Market Tax Credits, a Construction Loan, and Conventional Financing. This can be a blueprint for future private redevelopment initiatives in the area.

The City of Fort Dodge is planning to issue bonds for the engineering and construction of the Intermodal Hub. Prior to this occurring though, the dilapidated Wahkonsa Annex must come down. Currently, the City does not have capacity to bond for the full amount of this project as they're approaching their debt service levy policy maximum. This leaves a large gap in the project finances centered around the environmental remediation and demolition. The City is planning to use tax increment financing (TIF) for the demolition portion of this project but is relying on grant monies for the environmental remediation portion. Fort Dodge will once again partner with the Iowa Department on Natural Resources for a state brownfield remediation grant in the amount of $25,000. Although this amount is helpful, current costs for asbestos abatement are estimated at $600,000. City Leadership has pledged that if the EPA grant is secured, the 20% cost share portion will come from general funds. Although this is a difficult task, the City realizes the long-term value of this project is significantly higher. With the above financing mechanisms in place, this EPA Grant is critical for the future redevelopment of the downtown.

IV.E.1.c.ii Use of Existing Infrastructure (3 pts.)

This infill redevelopment will occur on portions of blocks that have provided little economic value for decades. The project will take advantage of existing public and private infrastructure and is not anticipated to be a drain on carrying capacity for connected utilities. Although the infrastructure is aged within the downtown, the City estimates that maintaining and repairing existing streets, storm drains and sanitary lines will be approximately 20-30% of the cost of replacement. The City intends to require demolition contractors to salvage and recycle as much of the building as possible. Bricks and concrete material will be stockpiled on City property and utilized for trails and road base on future paving projects. This will alleviate costly landfill disposal fees and will significantly lower future infrastructure costs. Steel, aluminum and copper will also be sent to scrap metal recyclers thus reducing demolition costs by up to 15%. In addition, the project's bike racks and bike-share docking stations will promote bicycle commuting to and from Downtown Fort Dodge and facilitate bicycle transportation as a viable alternative to vehicular travel optimizing use and life-span of existing roadway infrastructure.

IV.E.2 Community Need and Community Engagement (20 pts.)

IV.E.2.a Community Need (12 pts.)

IV.E.2.a.i The Community's Need for Funding (3 pts.)

With a population near 25,000, Fort Dodge has struggled to develop an identity as it is not classified as either rural or urban. Fort Dodge faces the daunting task of handling several urban-type issues (high poverty, declining population, etc.) while grappling with access to very few economic resources. An Existing Conditions Report completed in April of 2015 for the City of Fort Dodge revealed a comprehensive list of items that warrant attention. Attracting and retaining new businesses and improving the overall poor aesthetics of commercial and retail areas were on the top of that list. According to the US Census, Fort Dodge lost nearly 20% of its population between 1970 and 2010. Additionally, Fort Dodge's poverty level is one of the highest in the State of Iowa. The poverty rate of Census Tract 7, which includes the downtown core area, is 35.4%, almost triple that of Iowa (12.5%) and over double the national average (15.5%) (SAIPE, U.S. Census Bureau, 2015).

These statistics have negatively affected both the City's operating budget and their bonding capacity. In addition, Fort Dodge is near their tax levy limit and simply cannot generate additional funds through

taxation. Fort Dodge's aging infrastructure requires immediate attention and will take precedence over monies spent on environmental remediation. Despite operating within lean government initiatives, such as attrition for position vacancies, the financial condition remains challenging. An additional financial burden the City is contending with is the multifamily residential tax reform that was passed within Iowa in 2015. This creates a loss of tax revenues of nearly 40% on multifamily properties over the next seven years. Lastly, property valuation increases are not keeping pace with the City's annual increase in expenditures. On average, the City experiences about 2% growth in property tax values, but expenses increase by about 3% every year. All these factors greatly hinder the allocation of City dollars for environmental remediation projects.

IV.E.2.a.ii Threats to Sensitive Populations (9 pts.)

IV.E.2.a.ii.1 Health or Welfare of Sensitive Populations (3 pts.)

The Wahkonsa Annex is in a neighborhood with a comparatively high concentration of low-income individuals and poverty. According to the EPA EJSCREEN, the target area is in the 88th percentile of low-income populations compared to the rest of Iowa. There is also a day care center, residential areas with small children, a retirement facility and an elementary school all located within a 10-block radius of this property. The Wahkonsa Annex, although boarded up, is being broke into on a weekly basis. With these illegal activities taking place there is a constant fear of children and other members of the public getting injured on the property. The ongoing trespassing and vandalizing is releasing asbestos fibers into the environment. Cleaning up this site will reduce the health threats to the sensitive populations that are currently being impacted.

The redevelopment of the Wahkonsa Annex, along with the future redevelopment of neighboring Warden Plaza, will create the potential for additional housing and job opportunities in downtown Fort Dodge. For the low-income residents in the area, it is vital that there are job opportunities within a walking distance of their homes. The redevelopment of the Wahkonsa Annex will serve as a catalyst for other redevelopment projects in the area.

IV.E.2.a.ii.2 Greater Than Normal Incidence of Disease and Adverse Health Conditions (3 pts.)

Asbestos threats are often difficult to quantify. The concerning facts are that asbestos was used in thousands of building products and EPA has identified no safe quantities for inhalation. According to the Center for Disease Control (CDC), direct contact and ingestion of asbestos, a known carcinogen, can cause lung cancer and mesothelioma, a form of neoplasm of the lining of the chest and abdominal cavities.

Cleanup funds will allow the City to implement needed remediation of this building. The initial step in this process of assessing this abandoned building has been completed. The downtown residential population is approximately 1,500, and those residents are undoubtedly exposed to more environmental issues than those living in newer structures on the fringe of town. These individuals are unfortunately experiencing a higher potential for exposure to contaminants from their environment based on the age of the structures, as well as the historical land uses downtown. Asbestos exposure for children living in the downtown, which accounts for over 30% of its census tract is extremely alarming. This is verified by the Webster County Assessor's Office, which lists most structures within the downtown area being constructed prior to 1950 when asbestos was a common building material.

The proximity of these sensitive populations and the potential impacts resulting from the releases raises potential health concerns. The EPA's EJSCREEN places the target area in the 84th percentile in the state of Iowa for NATA Air Toxics Cancer risk, as well as in the 85th percentile in the state of Iowa for NATA Respiratory Hazard Index. By addressing asbestos contamination, it will ensure that future residents of this area and commercial tenants will have a lower exposure to this cancer-causing agent.

Additionally, The EPA's EJSCREEN Index shows a disproportionally high level of Traffic Proximity and Volume in the target area. The percentile is in the 91st percentile for the state, 92nd percentile for the EPA region, and 78th percentile nationally. Developments such as mixed-use buildings in the core of the

City will lead to many spin-off benefits that would potentially reduce the amount of driving in the core of the City by increasing the practicality of more sustainable modes of transportation, such as walking and biking.

IV.E.2.a.ii.3 Economically Impoverished/Disproportionately Impacted Populations (3 pts.)

The welfare of a community is dependent on income from commercial property tax, economic development investment, and the production and sales of goods and services. Fort Dodge has unfortunately been lacking in all three of these factors. As mentioned in the section above, the City has suffered a significant loss of population over the last four decades, which in turn led to both a loss of employment and disinvestment in the community. As a result, residents in the target area disproportionally bare the environmental burden of vacant and nuisance properties. The EPA's EJSCREEN Demographic Index, which is a combination of percent low-income and percent minority, indicates that the target area is in the 85th percentile for the state of Iowa and in the 78th percentile for the EPA region, respectively. Without a healthy mix of housing and commercial opportunities, this trend is bound to continue. The City believes the only way to mitigate and eliminate environmental concerns associated with Wahkonsa Annex will be through proactive redevelopment with implementation of containment, cleanup, and removal of asbestos that is currently impacting the downtown population. Fort Dodge is dedicated to reversing this trend by charting out a revitalized downtown that will balance the priorities of improving environmental, economic and social well-being. As a result of this proactive stance to address asbestos within the Wahkonsa Annex, the environmental benefits are expected to include:

- Less exposure to cancer causing agents from this property and other downtown brownfield sites;
- Decrease in violent crime due to additional residents living, working and recreating downtown;
- Less obesity as a result of more direct opportunities for outdoor recreation from new green spaces from redeveloped brownfield properties.

IV.E.2.b Community Engagement (8 pts.)

IV.E.2.b.i Community Involvement (5 pts.)

Fort Dodge is committed to community transformation. The Fort Dodge City Council approved the application process (Resolution 19-01-025) at the January 14, 2019 City Council meeting. Draft versions of the brownfield cleanup grant application and associated Analysis to Brownfield Cleanup Alternatives (ABCA) were available for public comment. The resolution affirms that the well-being of the community is an important part of upholding the public interest.

Partnerships provide the foundation to overcome a challenge as significant as the Wahkonsa Annex. Effective partnerships leverage the strengths of each partner and apply them strategically to the opportunity at hand. For a community like Fort Dodge, a structure of this size and scope requires an "all in" approach that demands all stakeholders make an important investment in the project. With strong support from the business sector, the goal is to engage the primary sector companies in this community partnership to help bring this exciting and innovative project to fruition. The following partners have pledged their support for this project:

- The City will continue its strong relationship with the Iowa Department of Natural Resources (IDNR), the state agency responsible for conserving and enhancing Iowa's natural resources. The IDNR carries out state and federal laws that protect air, land and water and administer the state Brownfields Program. The City first began working with the DNR and the State Brownfield Program in 2000 and have worked on dozens of sites throughout the community. The IDNR Brownfields Program will be instrumental in assisting with added funding for the cleanup.
- Webster County Public Health Department (WCPHD) will once again partner with the City of Fort Dodge on this brownfield project. WCPHD's mission is to promote and maintain health for all, to prevent disease and disability, and to collaborate, coordinate, develop and implement community health programs and provide comprehensive care to the ill and disabled.

- The City will own and maintain the Intermodal Hub once complete and will partner with Mid-Iowa Development Association (MIDAS) through a cooperative agreement. MIDAS is an inter-governmental agency and currently operates and maintains the DART transit authority. Space will likely be leased to MIDAS for their ticketing and dispatch service space. The City will also own and operate the bike-share and bike rack facilities. Revenues generated from the rented parking spaces from the adjacent Warden Plaza will cover monthly costs for the bike-share program.
- Greater Fort Dodge Growth Alliance (Growth Alliance) has a mission to unify and coordinate accountable economic and community development while enhancing the quality of life in Fort Dodge. The Growth Alliance has pledged to provide direct assistance to the City in identifying target properties that are catalysts for redevelopment to further bolster this area. The Growth Alliance's contacts in this arena are long and diversified, meaning they have relationships with residential, commercial, and retail property developers throughout the Fort Dodge region.
- Main Street Fort Dodge is a volunteer organization that works with business and property owners in the 33-block downtown to foster public-private partnerships to revitalize and market Historic Downtown Fort Dodge. Main Street Fort Dodge will hold public workshops and educate citizens on the project and importance of a healthy downtown environment.

Project Partners		
Partner Name	**Point of contact**	**Specific role in the project**
Iowa Department of Natural Resources	Mel Pins – mel.pins@dnr.iowa.gov – 515.725.8344	Provide additional grant funding for asbestos abatement in the amount of $25,000.
Webster County Public Health	Kari Prescott – kprescott@webstercounty.org 515.571.1656	Answer health related questions with regard to contaminants of concern.
Mid-Iowa Development Association (MIDAS)	Cliff Weldon – cweldon@midascog.net – 515.567.7186	Partner of Intermodal Hub once complete for public transportation.
Greater Fort Dodge Growth Alliance	Dennis Plautz – dennis@greaterfortdodge.com 515.955.5500	Identify target properties that are catalyst for downtown redevelopment.
Main Street Fort Dodge	Kris Patrick - kris@mainstreetfd.org - 515.573.3172	Hold public workshops and educate citizens on the project and importance of a healthy downtown environment.

IV.E.2.b.ii Incorporating Community Input (3 pts.)

The City intends to provide periodic progress updates to City Council and the public. This will include information on the project schedule, providing draft and final versions of reports for public review/comment/input and discussing the cleanup and redevelopment plan. Progress will be updated on the City's brownfield website, http://www.fortdodgebrownfields.com/ which is linked to the City's website. The website will have a comments section added to allow citizens to ask questions to City staff about the cleanup and redevelopment initiative. The website will also provide citizens with the positive message of how EPA funding is assisting with this substantial redevelopment initiative. The City will host at least two open house events each year at various venues throughout the community, such as churches, schools, or non-profits to keep interested citizens apprised about the progress and to solicit community input. This input will be recorded by City staff at each event. Meeting information will be published in the local newspaper, the City's website (and brownfield website), and posted at public

buildings such as City Hall and the public library. The City will also utilize social media outlets such as Facebook and Twitter to keep citizens apprised of this important endeavor. Fort Dodge has a relatively low non-English speaking population (14%); however the City will provide translation services in Spanish, which is the highest minority (10%). The combination of these community input actions will provide an opportunity to update and engage residents on the progress of the City's successful brownfields program.

IV.E.3 Task Descriptions, Cost Estimates, and Measuring Progress (35 pts.)

IV.E.3.a Proposed Cleanup Plan (8 pts.)

The City will competitively procure the services of a Qualified Environmental Professional (QEP) in accordance with grant requirements to oversee the response action of this project. The City will require the QEP be experienced with EPA Brownfield Cleanup projects and hold State of Iowa asbestos certifications. Abatement of all asbestos containing materials identified in the ABCA is an integral part of demolition activities and must follow both State and Federal regulations. Therefore, this project will warrant the development of a comprehensive project design. This document will define the expectations of the City, the requirements of the work, the scope of the project, and will ultimately be used as part of the bid process for the abatement work. The specification documents will be prepared by a Project Designer accredited by the Iowa Division of Labor.

Asbestos abatement shall be performed only by a properly trained, licensed, and insured contractor. When selecting an asbestos abatement contractor, the City will focus on a prequalifications. This process will evaluate previous work experience, skills in a similar work environment, length of service history, and business or company stability. Site contract administration for asbestos abatement activities will include someone with competent person credentials. The asbestos removal will be planned and conducted in rigorous detail. The project will require the complete and total removal of all asbestos material and control of all asbestos fibers that may be released because of the abatement work. Asbestos removal is not considered complete until the surfaces from which the material was removed are inspected and cleared by professionals. At that point, the structure can be demolished.

To address the asbestos contamination at this site, the following two alternatives were outlined in the draft ABCA: Alternative #1: No Action and Alternative #2: Full Abatement and Proper Disposal.

The "No Action" alternative involves no remedial activities. This alternative does not include a means for mitigating or eliminating potential exposure to asbestos both during and following redevelopment. Therefore, the potential for human exposure continues to exist for future residents, commercial and site workers, and visitors. As such, the "No Action" response is not wholly protective of human health and the environment. Additionally, without action, the toxicity, mobility, and volume of contaminants will not be reduced. Therefore, this alternative is ineffective as a permanent remedial solution. As a result, this alternative cannot be considered as a final alternative for this issue.

The "Full Abatement and Proper Disposal" alternative relies on proper engineering controls and industry proven techniques to effectively abate and dispose of asbestos. Once the remediation is complete, this method would permanently eliminate the potential exposure to asbestos. Based on these considerations, this alternative is highly effective and reliable.

IV.E.3.b Description of Tasks and Activities (12 pts.)

Task 1 – Project Coordination: As lead agency, the City of Fort Dodge will manage the overall planning and coordination of the cleanup activities. The City's Brownfield Project Coordinator will serve as the liaison in coordinating with federal and state agencies to ensure that the City meets its objectives in a cost-effective and efficient manner. Interim communication will be enhanced by use of e-mail status reports among City team members, agencies, partners and key stakeholders. The City will record all site activities through the EPA ACRES Database. This includes, but is not limited to, the creation and retention of full and part time jobs generated by this grant. The contractual costs associated with this task will be for coordination of the environmental contractor and EPA and DNR to ensure compliance with the grant. Upon

successful completion of the asbestos abatement, the City and environmental contractor will prepare a Completion Report summarizing cleanup activities including photographic documentation and submit to the EPA for review and comment. This will also include all documentation needed by the IDNR and EPA. The City will update the EPA ACRES database to ensure all activities are properly reported to the EPA.

Task 2 - Community Outreach: 2% of grant funds will go towards the community outreach initiatives as indicated in Section IV.E.2.b.ii Incorporating Community Input. City staff will continue to educate the public on the benefits of the EPA Brownfields Program. Previous brownfield funding has been extremely helpful with past redevelopment and the City's outreach initiatives are always positively received and in person events well attended. The City will look to build off this momentum if awarded this cleanup grant.

Task 3 - Cleanup Planning: 6% of grant funds will be dedicated to cleanup planning. Cleanup planning will include finalizing the ABCA document, preparing the Quality Assurance Project Plan for confirmation sampling, and negotiating and receiving the necessary regulatory approvals. Cleanup specification documents for the implementation of the cleanup activities will be prepared under this task. These documents will be submitted to EPA and/or IDNR for approval prior to obtaining bids from qualified cleanup contractors. Following the acceptance of these documents, the City will initiate a competitive selection process and contract with a qualified cleanup contractor to implement the response activity.

Task 4 – Site Cleanup: The City has budgeted approximately 87% of the grant to this task. In addition, the City's cost share ($100,000) for this task will be satisfied through monies from the City's general funds. This task includes, but is not limited to, correspondence with the environmental consultant and remediation contractor, providing minimal site prep and providing site security during cleanup.

IV.E.3.c Cost Estimates and Outputs (10 pts.)

Budget Categories		**Project Tasks ($) [programmatic costs only]**				
		Task 1 – Project Coordination	Task 2 – Community Outreach	Task 3 – Cleanup Planning	Task 4 – Site Cleanup	Total
Direct Costs	Personnel	$6,500	$3,250	$1,625	$3,250	$14,625
	Fringe Benefits	$1,300	$625	$325	$625	$2,875
	Travel[1]	$3,500	$0	$0	$0	$3,500
	Equipment[2]	$0	$0	$0	$0	$0
	Supplies	$0	$0	$0	$0	$0
	Contractual	$12,000	$7,000	$30,000	$430,000	$479,000
	Other (specify)	$0	$0	$0	$0	$0
Total Direct Costs[3]		$23,300	$10,875	$31,950	$433,875	$500,000
Indirect Costs[3]		$0	$0	$0	$0	$0
Total Federal Funding (Not to exceed $500,000)		$0	$0	$0	$0	$0
Cost Share (20%)		$0	$0	$0	$100,000	$100,000
Total Budget		**$23,300**	**$10,875**	**$31,950**	**$533,875**	**$600,000**

Budget Allocation:

- Task 1 – Project Coordination: Personnel is based off ~160 hours at $40/hr = $6,500; Fringe Rate is 20% of hourly rate = $1,300; Travel will cover airfare and/or mileage, hotels and meals for EPA sponsored brownfield events; Contractor costs will be competitively bid with approved hourly rates.

- Task 2 – Community Outreach: Personnel is based off ~80 hours at $40/hr = $3,250; Fringe Rate is 20% of hourly rate = $625; Contractor costs will be competitively bid with approved hourly rates.
- Task 3 – Cleanup Planning: Personnel is based off ~40 hours at $40/hr = $1,625; Fringe Rate is 20% of hourly rate = $325; Contractor costs will be competitively bid with approved hourly rates.
- Task 4 – Site Cleanup: Personnel is based off ~80 hours at $40/hr = $3,250; Fringe Rate is 20% of hourly rate = $625; Contractor costs will be competitively bid with approved hourly rates. Cost share is 20% of overall grant ($500,000) and equates to $100,000 and will come from the City's general funds.

The anticipated outputs for this grant include: a signed contract with a QEP, 12 Quarterly reports and MBE/WBE reporting, Community Relations Plan (CRP), public meetings with minutes, Final ABCA, Quality Assurance Project Plan, technical specifications for asbestos abatement, remediation contract, clearance monitoring and closeout reports. These outputs are all quantifiable and will be detailed in the quarterly reports. In addition, the EPA ACRES Database will be updated throughout the life of the grant.

IV.E.3.d Measuring Environmental Results (5 pts.)

The City of Fort Dodge will develop a detailed schedule and workplan for implementing planned outputs under the proposed grant. The workplan will detail key milestones within the grant period for documenting and communicating outputs and outcomes to the public, EPA Region 7, and other partners with all progress detailed in quarterly reports. Prior to the completion of each quarterly report, the project manager will review and evaluate the project progress and take any necessary corrective actions should the schedule fall behind. Corrective actions may include holding weekly meetings/conference calls to ensure tasks are being completed as projected or incorporating a real time tracker to monitor progress by all parties working on the grant as they occur. Lastly, the City will utilize the ACRES Database to report, document, and track information such as job creation, dollars leveraged, properties cleared for redevelopment, and exposure risks reduced/eliminated. These statistics will also be communicated to the IDNR and other projects partners.

IV.E.4 Programmatic Capability and Past Performance (15 pts.)

IV.E.4.a Programmatic Capability (9 pts.)

IV.E.4.a.i Organizational Structure (5 pts.)

Fort Dodge has the requisite skills to satisfy all phases of work under this grant. The City will prepare a Request for Proposals/ Qualifications to procure a professional environmental services firm. The City will focus on securing the services of a firm experienced in performing work funded through this program and familiar with the program's requirements. In addition to securing these services, the City envisions providing overall management of the consultant's work, implementing public involvement, and assuming responsibility for the financial management of the program (e.g., draw requests, quarterly reports, etc.).

The City has dedicated three highly qualified staff members to implement and administer the grant if awarded. Ms. Vickie Reeck, Ms. Peggie Fishel, and Ms. Maggie Murray will have direct responsibilities for this project. Ms. Reeck, who will act as the lead Brownfield Coordinator, has been with the City for 30 years and currently holds the position of Community and Economic Development Director. Ms. Reeck has assisted with the acquisition of nearly $13 million of property and helped secure and administer nearly $10 million with various state and federal programs. Ms. Reeck currently works to expand relationships with the local and regional development organizations by identifying and marketing in-fill properties in Fort Dodge. Ms. Fishel has been with the City for 21 years with 16 of those years working in the Community Development Division helping with property acquisition, environmental assessments and demolition projects. Ms. Murray is a Planner with four years of experience working on various community redevelopment projects throughout Fort Dodge. Both Ms. Fishel and Ms. Murray will support Ms. Reeck

and assist with community outreach, scheduling, and coordination with the environmental consultant, DNR and EPA.

IV.E.4.a.ii Acquiring Additional Resources (4 pts.)

In the unlikely event any of these staff members pursue opportunities outside the City, replacement candidates will be required to have federal grant management experience. In addition, the City will issue a Request for Qualifications and hire a qualified environmental firm during the first quarter of the grant cycle to assist with project coordination, community outreach, cleanup planning and site cleanup. All hiring will follow federal procurement requirements which will also satisfy Iowa Code. The City will require the environmental firm has adequate experience with EPA Brownfield projects as well as holding appropriate state certifications to work on a project involving hazardous materials.

IV.E.4.b Past Performance and Accomplishments (6 pts.)

IV.E.4.b.i Currently Has or Previously Received an EPA Brownfields Grant (6 pts.)

The City of Fort Dodge has been the recipient of two EPA Brownfield Grants; a Pilot Grant in 2000 and a Hazardous & Petroleum Assessment Grant in 2013. Both Grants were successfully closed out upon expenditure of funds. It is important to note that 58 parcels were assessed via Phase I ESAs as well as 30 parcels via Phase II ESAs with the 2013 Grant. This far exceeds the Work Plan objectives of 25-30 Phase I ESAs and 12-16 Phase II ESAs. <u>While assessed properties varied in size and complexity, 85% of the properties assessed have changed owners or seen some form of progress since 2013.</u> Fort Dodge has made unprecedented effecient use of EPA grant dollars and will continue to do so if given the opportunity.

IV.E.4.b.i.1 Accomplishments (3 pts.)

Accomplishments on the $200,000 Assessment Pilot Grant (Oct 1, 2000 – Sept 30, 2003) included:

- Improved the quality of life for City residents, especially those living along the riverfronts.
- Reclaimed approximately 5.3 acres of brownfield properties for use as greenspace.
- Construction of walking trails to provide an alternative mode of transportation thus reducing emissions and improving the environment and community health.

Accomplishments on the $400,000 Assessment Grant (Oct 1, 2013-Sept 30, 2016): included:

- Attended the 2015 annual Brownfields Conference as well as DNR workshops.
- Assessment of 58 parcels via Phase I ESAs and 30 via Phase II ESAs.
- Continual community outreach, including user-friendly website with information on the program.
- Conducted redevelopment planning on four parcels.

The City collaborated with its environmental consultant to create outreach tools intended to keep residents informed about the project and the brownfield assessment progress. This included an informational brochure, creation of a website to inform and track progress, hosted annual outreach meetings and maintained a depository of completed reports at City Hall for public viewing. All brownfield objectives were tracked, measured and accounted for via quarterly reports to EPA and updating the ACRES database.

IV.E.4.b.i.2 Compliance with Grant Requirements (3 pts.)

Fort Dodge did not have any adverse findings associated with the 2000 Pilot Grant or the 2013 Hazardous and Petroleum Grants and 100% of the funds were expended. The City performed all activities required to meet the programmatic requirements of the cooperative agreement, which includes completion of all reporting and administrative requirements. The City was in compliance with the workplan, schedule and terms and conditions of each grant. In addition, the EPA ACRES database was updated throughout the life of the assessment grant to show accomplishments with properties assessed as well as jobs created.

Analysis of Brownfields Cleanup Alternatives and Remedial Action Plan

Wahkonsa Annex
908 1st Avenue South
Fort Dodge, Iowa 50501

Prepared For:

City of Fort Dodge
819 1st Avenue South
Fort Dodge, Iowa 50501

Prepared by:

9550 Hickman Road, Suite 105
Clive, Iowa 50325

DRAFT

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APPENDIX A

1.0 INTRODUCTION

Impact7G, Inc. (Impact7G) has been retained by City of Fort Dodge to prepare this Draft Analysis of Brownfields Cleanup Alternatives and Remedial Action Plan (ABCA/RAP) for the Wahkonsa Annex located at 908 1st Avenue South in Fort Dodge, Iowa (the Site). This document was prepared as part of the application process for a FY19 EPA Brownfield Cleanup Grant. The following report provides a technical evaluation of remedial alternatives for addressing the identified environmental conditions at the Site and presents a work plan for the selected remedial alternative should this site be awarded a grant.

1.1 PURPOSE AND SCOPE

The purpose of this report is to:

1. Provide a summary of Site background and documented environmental impacts (including threats to public health and/or the environment) to support the need for environmental response actions.
2. Evaluate appropriate cleanup alternatives to mitigate identified environmental conditions at the Site.
3. Select the remedial alternative that best meets the objectives and considerations of the project.
4. Present a general work plan for implementing the selected remedial alternative.

Information on known Site conditions is based on the results of investigations completed for City of Fort Dodge during acquisition of the Site and preliminary project planning. These investigations, which are summarized in Section 3, include the following:

- March 24, 2017, Asbestos Containing Materials (ACM) Inspection, completed by Impact7G.

Consistent with the findings of these environmental investigations, environmental conditions within the Site building that need to be addressed include the following:

- Asbestos-containing materials (ACM)

Each considered remedial alternative was evaluated based on the following criteria:

- Effectiveness and reliability
- Feasibility and ease of implementation
- Risk reduction and associated benefits
- Cost effectiveness
- Estimated time to reach a permanent solution

Consideration was given to the following items in the development of the conceptual site model and remedial alternatives:

- Nature of asbestos and other hazardous building material (HBM) throughout the Site building
- Potential exposure to onsite and off-site human receptors from residual contamination existing prior to any remedial action and remaining after the remedial action including:
- Potential onsite and off-site human receptors including high frequency children present, low frequency children present, high frequency adults only present and low frequency adults only present (i.e. future residents, commercial workers, and/or commercial patrons)
- Potential off-site receptors including adjourning residential properties
- Compatibility of any remedial alternative with the planned future reuse of the Site

2.0 SITE BACKGROUND

The Site is comprised of one approximately 0.44-acre (19166.4 square feet) parcel located at 908 1st Avenue South in Fort Dodge, Iowa. The Site is currently owned by the City of Fort Dodge and is improved with a seven-story vacant building with an associated basement, featuring symmetrical brick facades with Italian Renaissance Revival-influenced brick detailing including quoining and relief brickwork. The building was most recently used as low-income housing (Wahkonsa Manor).

The Site was originally constructed by the City's 'Commercial' Club in 1909-1910 and was claimed to be the "largest fireproof hostelry" in Iowa at the time of completion. The building operated as a first-class hotel for over 60 years (by various owners) until 1972 when it was converted into apartment housing for low-income residents. Situated on 1st Avenue South, and at the corner of South 10th Street. The Site building has been vacant since 1984 and has fallen into significant disrepair.

As discussed in **Section 3**, an ACM Inspection was completed in March 2017. Extensive asbestos-containing materials (ACMs) were identified during the inspections.

Figure 1 locates the Site on the Fort Dodge, Iowa Quadrangle prepared by the United States Geological Survey (USGS).

2.1 SURROUNDING LAND USE

The Site is located in a commercial area of Fort Dodge. The Site is bound to the north and west by adjoining commercial buildings; to the east by S 10th Street and commercial development, and to the south by Central Avenue and commercial development.

2.2 FUTURE SITE USE

City of Fort Dodge plans to demolish the historic building and redevelop the Site with an Intermodal Hub. This redevelopment effort plans to create affordable parking for the downtown area and for the projected redevelopment of the Warden Plaza, that adjoins the Site to the west.

3.0 SUMMARY OF PREVIOUS ENVIRONMENTAL INVESTIGATIONS

The following subsections are provided to summarize the previous environmental investigations completed at the Site.

ACM Inspection, March 24, 2017, Impact7G

Impact7G performed an ACM Inspection for the current Site building in March 2017. Bulk potential ACM samples were collected by Iowa licensed staff and submitted to an accredited asbestos laboratory for polarized light microscopy (PLM) analysis.

ACM was identified in various forms throughout the building located on the Site. The following table summarizes locations within the Site building that have been identified to contain ACM.

Material Substance	Location	Asbestos Content	Est. Quantity
Electrical Wire Insulation – White	Throughout – Exposed and within wall/ceiling cavities	40% Chrysotile	1,000 LF – fixtures Throughout wall/ceiling cavities
Electrical Wire Insulation – Black	Throughout – Exposed and within wall/ceiling cavities	35% Chrysotile	1,000 LF – fixtures Throughout wall/ceiling cavities
Fire Door – Elevator	5th Floor – Warden Plaza	20% Chrysotile	2 Doors
Boiler Tar Wrap and Debris	Basement Throughout	4-5% Chrysotile	550 SF
Boiler Tank- TSI and Debris	Basement Throughout	20-30% Chrysotile	1,000 SF
Gaskets – 6”	Basement Throughout	30-40% Chrysotile	30 Gaskets
Pipe Insulation – Air-cell	Basement Throughout	10-25% Chrysotile	3,000 LF
Mudded Fittings on Pipes and Valves	Basement Throughout	10-12% Chrysotile	800 MF
Straight Pipe – Millboard	Basement Throughout	20-25% Chrysotile	2,000 LF
Window Glazing	All Original Windows	2% Chrysotile	310 Windows
9” Floor Tile with Black Mastic	Throughout	2-3% Chrysotile (ND-Mastic)	1st Floor: 1,500 SF 2nd -4th Floor: 2,000 SF per Floor 5th-7th Floor: 1,300 SF per Floor
Heat Shields in Round Ceiling Lights	Throughout	30-40% Chrysotile	365 fixtures
Drywall Joint Compound	2nd Floor – 7th Floor	2% Chrysotile	11,000 SF
Sink Undercoating – Black	Throughout	5% Chrysotile	30 Sinks
9” Floor Tile with Black Mastic	1st Floor and Throughout	2-7% Chrysotile	1,500 SF
Puck Mastic on Wall for Wall Paneling – Black	1st Floor Room with Multi-colored Tile Floor	4% Chrysotile	850 SF
Transite Fume Hood	1st Floor NW Room	35% Chrysotile	5 SF
Caulking on Smooth Stucco	Exterior	8% Chrysotile	2,800 SF
Transite Soffit	Exterior, South Entrance Overhand	40% Chrysotile	1,500 SF
Pink/White Ceiling Texture and Debris on Floor	2nd Floor	10% Chrysotile	365 SF
Wood Grain Pattern 9” x 9” Floor Tile with Black Mastic	Level M (one Room)	Tile: 2% Chrysotile Mastic: 2% Chrysotile	200 SF
Sheet Flooring (on top of asbestos 9” floor tile & mastic)	1st Floor	15% Chrysotile	500 SF
Transite Above Door	Level M	10% Chrysotile	15 SF

Material Substance	Location	Asbestos Content	Est. Quantity
HVAC Seam Tape & Debris	On Salvaged and Piled Ductwork in Basement	60% Chrysotile	1,000 LF
Wall Mastic – Green	East Building Kitchens	4% Chrysotile	1100 SF
Wall Mastic Puck – Black	East Building	4% Chrysotile	25 SF
Wall Mastic – Black	East Building Throughout	3% Chrysotile	3000 SF
Tile Mastic Bathroom - Brown	East Building Throughout	2% Chrysotile	550 SF
Wood Panel Mastic - Brown	East Building Throughout	3% Chrysotile	1000 SF

Note: Additional samples were collected for ACM with non-detect results.

4.0 CONCEPTUAL SITE MODEL

A conceptual site model (CSM) was developed using the findings of the ACM Inspection Report. This CSM includes descriptions of the location and physical setting of the Site, contaminants of concern (COCs), exposure pathways, and potential human and environmental receptors.

4.1 PHYSICAL SETTING

Site Location

The Site is located in a dense urban setting surrounded by commercial properties.

Site Topography and Drainage

Topography at the Site is flat with a gentle local slope to the west towards the Des Moines River located approximately 0.72 miles away. The entire Site is covered by the building and consists of impermeable surfaces. The stormwater at the Site is directed via sheet flow to municipal stormwater collection basins along Central Avenue and S 10th Street.

Site Groundwater and Hydrogeology

No subsurface investigations are known to have been conducted to date at the Site. Depth to groundwater and groundwater flow direction has not been assessed. Based on local topography and nearby surface water bodies, it can be presumed groundwater generally flows to the west-southwest toward the Des Moines River.

Geological Characteristics

According to the US Geological Survey (Zen, *et al, 1983) Bedrock Geologic Map of Iowa*, bedrock below the Site consists of the lower Jurassic arkose, siltstone, sandstone and black shale of the Portland Formation. The depth to bedrock at the Site is not known.

4.2 CURRENT CONTAMINANTS OF CONCERN

Asbestos (in ACMs) has been detected at concentration exceeding regulatory criteria and are considered the primary HBMs under this ABCA/RAP.

No soil or groundwater analytical assessments are known to have been conducted at the Site.

4.3 EXPOSURE PATHWAYS AND POTENTIAL RECEPTORS

Exposure Pathways describe how a human or environmental receptor comes into contact with contaminants that may be present at the Site. Exposure pathways presented in the CSM include the following:

Inhalation:	This pathway is primarily associated with groundwater contamination within 30 feet of an occupied structure when groundwater elevation is less than 15 feet below surface grade, or when depth to groundwater is unknown. This pathway is applicable when receptors may inhale impacted media in the form of contaminated vapor.
Dermal Absorption:	Exposure via dermal absorption occurs when receptors are exposed to contaminant concentrations present in soil, groundwater, surface water, or building materials through direct contact with the skin.
Active Ingestion:	The active ingestion pathway represents exposure which may occur through the active ingestion of contaminant concentrations via a drinking water supply well, through agricultural products, or through direct consumption of impacted media (i.e. impacted soil, lead based paint chips, etc.).
Incidental Uptake:	This pathway is applicable when receptors may incidentally ingest/inhale impacted media in the form of contaminated dust, or airborne asbestos particulates.

Potential Receptors are categorized by age, duration of exposure, and intensity of use at the Site. The receptor categories described in the CSM include the following:

Child Present High Frequency:	Receptor is defined as a child residing, attending school or daycare, or if a large number of children are present regardless of any single child's frequency of use. High frequency is defined as a period of 8 hours or more per day on a continuing basis.
Child Present Low Frequency:	Receptor is defined as a child being present at a Site only as an infrequent visitor (less than two hours per day or a full day on a sporadic basis).
Adults ONLY Present High Frequency:	Receptor is defined as having only adults reside or work at a Site for a period of 8 hours or more per day on a continuing basis.
Adults ONLY Present Low Frequency:	Receptor is defined as having only adults at the Site as infrequent visitors (less than two hours per day or a full day on a sporadic basis).
Terrestrial and Aquatic Biota:	These receptors include flora and fauna which may be exposed to contaminants in their respective land-based or aquatic environments.

4.4 CONCEPTUAL SITE MODEL SUMMARY

Based on the findings of the ACM Inspection Report reviewed by Impact7G as a part of this ABCA/RAP, ACM is present in the Site building and may be encountered by each of the four human receptor groups (child present high frequency, child present low frequency, adult only present high frequency and adult only present low frequency receptors) and include future residents, commercial workers, commercial patrons, and/or demolition and construction workers. If ACM is not properly addressed during redevelopment, primary impacted media would include indoor air and interior and exterior surfaces. The potential exposure pathways would be through incidental uptake and/or active ingestion of dusts generated from these materials.

5.0 ESTIMATE OF IMPACTED MEDIAL AND CLEANUP GOALS

5.1 ESTIMATE OF IMPACTED MEDIA

Impact7G prepared estimated quantities of ACM that were identified in the Site building:

ACM	Quantity
Electrical Wire Insulation – White	1,000 LF – fixtures Throughout wall/ceiling cavities
Electrical Wire Insulation – Black	1,000 LF – fixtures Throughout wall/ceiling cavities
Fire Door – Elevator	2 Doors
Boiler Tar Wrap and Debris	550 SF
Boiler Tank- TSI and Debris	1,000 SF
Gaskets – 6”	30 Gaskets
Pipe Insulation – Air-cell	3,000 LF
Mudded Fittings on Pipes and Valves	800 MF
Straight Pipe – Millboard	2,000 LF
Window Glazing	310 Windows
9” Floor Tile with Black Mastic	1st Floor: 1,500 SF 2nd -4th Floor: 2,000 SF per Floor 5th-7th Floor: 1,300 SF per Floor
Heat Shields in Round Ceiling Lights	365 fixtures
Drywall Joint Compound	11,000 SF
Sink Undercoating – Black	30 Sinks
9” Floor Tile with Black Mastic	1,500 SF
Puck Mastic on Wall for Wall Paneling – Black	850 SF

ACM	Quantity
Transite Fume Hood	5 SF
Caulking on Smooth Stucco	2,800 SF
Transite Soffit	1,500 SF
Pink/White Ceiling Texture and Debris on Floor	365 SF
Wood Grain Pattern 9" x 9" Floor Tile with Black Mastic	200 SF
Sheet Flooring (on top of asbestos 9" floor tile & mastic)	500 SF
Transite Above Door	15 SF
HVAC Seam Tape & Debris	1,000 LF
Wall Mastic – Green	1100 SF
Wall Mastic Puck – Black	25 SF
Wall Mastic – Black	3000 SF
Tile Mastic Bathroom - Brown	550 SF
Wood Panel Mastic - Brown	1000 SF

5.2 CLEANUP GOALS AND APPLICABLE GUIDELINES

To determine necessary remedial actions at the Site, the sampling results were compared to applicable state and federal standards/guidelines and/or background concentrations. These standards and/or guidelines for each sampled media are described below.

The goal relative to the identified HBMs is to eliminate or manage the risks to human health and to the environment through proper management, mitigation, and/or disposal of identified HBMs.

Asbestos Containing Materials

ACMs will be managed in accordance with all local, state and federal regulations and the National Emissions Standards of Hazardous Air Pollutants (NESHAP).

6.0 DESCRIPTION OF REMEDIAL ALTERTATIVES

The remedial actions selected for the Site should accomplish the following objectives:

- Minimize the potential for exposure to and/or improper disposal of asbestos.
- Meet the redevelopment goals for the Site.

Multiple remedial alternatives are available to address the identified HBMs at the Site. However, based on our past experience at sites with similar contaminants and conditions, we have pre- screened general advantages and disadvantages of various treatment options and have selected the following four remedial alternatives for further evaluation and comparison.

1. Alternative #1: No action
2. Alternative #2: Full abatement and proper disposal of HBM

These remedial alternatives were evaluated for implementation at the Site and are further discussed in the following sections.

6.1 ALTERNATIVE #1 – NO ACTION

A "No Action" alternative signifies that no remediation activities would be implemented at the Site. The "No Action" alternative does not include a means for mitigating or eliminating potential exposure to contaminated soil or building materials both during and following redevelopment. Therefore, the potential for human exposure continues to exist for future residents, excavation/construction workers, commercial workers and patrons. This alternative is presented and discussed through the subsequent portions of this report as a baseline comparison and represents the existing conditions at the Site.

6.2 ALTERNATIVE #2 – FULL ABATEMENT OF HBM

This alternative would utilize standard techniques to remove the ACM. HBM would be removed by state certified contractors and properly disposed at a licensed facility. The Site building would be free of hazardous building materials with this alternative.

7.0 COMPARISON OF ALTERTATIVES

As discussed in the previous section, two remedial alternatives were evaluated to address the identified HBMs at the Site. These remedial alternatives are evaluated and compared to one another in this section. The comparisons of the remedial alternatives have been conducted using the five criteria listed below:

1. Effectiveness and Reliability
2. Feasibility and Ease of Implementation
3. Risk Reduction & Green Remediation
4. Cost Effectiveness
5. Estimated Time to Reach "No Further Action"

A brief summary of these five criteria and a discussion as to how they pertain to the available selected remedial alternatives is presented below. A comparison of remedial alternatives with respect to the above-listed criteria for each selected alternative is presented on **Table 1** at the end of this Section.

7.1 DESCRIPTION OF EVALUATION CRITERIA

Effectiveness and Reliability

This criterion addresses the ability of the alternative to meet the cleanup standards and the long- term reliability of the alternative.

Feasibility and Ease of Implementation

This criterion analyzes technical feasibility and the availability of services and materials. Availability of services and materials evaluates the need for off-Site treatment, storage, or disposal services and the availability of such services. Necessary equipment, specialists, and additional resources are also evaluated.

Risk Reduction and Green Remediation

This criterion is categorized as a threshold criterion. Alternatives must pass this criterion to be considered for implementation as the recommended alternative. It addresses whether or not a remedy provides adequate

protection and describes how the risks posed by the Site are eliminated, reduced, or controlled. Protection of human health is assessed by evaluating how risk from each exposure route is eliminated, reduced, or controlled through specific alternatives.

This criterion also evaluates the extent of green remediation techniques to be employed as part of the project and their associated benefits. This criterion will be evaluated based on its consistency with EPA's *Principle for Greener Cleanup* policy.

Cost Effectiveness

Cost information presented for the alternatives evaluates the estimated capital, operational and maintenance costs of each alternative. Capital costs include direct capital costs such as materials and equipment. Costs are presented as a balancing criterion such that if a number of remedial alternatives are comparable for the previously discussed criteria, cost may be used as a distinguishing factor in the selection of the remedial action. Estimated costs were developed based on prior project and contractor experience, and current estimates received from contractors. Remediation is scheduled to take place in 2019, and as such, costs presented are in year 2019 dollars.

Estimated Time to Reach Permanent Solution

This criterion is defined as the time it will take to achieve a permanent solution by removal of the threat of exposure to any of the applicable receptors without the need for continued management or monitoring of HBMs at the Site. Estimated time includes any applicable closure reporting and confirmatory analyses as required by the Commonwealth of Massachusetts.

7.2 EVALUATION OF ALTERNATIVES

Alternative #1 – No Action

The "No Action" alternative involves no remedial activities at the Site. This alternative does not include a means for mitigating or eliminating potential exposure to hazardous building materials both during and following redevelopment. Therefore, the potential for human exposure continues to exist for future residents, commercial and Site workers, and visitors. As such, the "No Action" response is not wholly protective of human health and the environment. Additionally, without action, the toxicity, mobility, and volume of contaminants will not be reduced. Therefore, this alternative is ineffective as a permanent remedial solution. As a result, this alternative cannot be considered as a final alternative for this issue and will not be evaluated further in this ABCA/RAP.

Alternative #2 – Full Abatement and Proper Disposal of HBM

Effectiveness and Reliability

This alternative relies on proper engineering controls and industry proven techniques to effectively abate and dispose of the HBM. Once the remediation is complete, this method would permanently eliminate the potential exposure to HBM and petroleum impacted soil (if any). Based on these considerations, this alternative is highly effective and reliable.

Feasibility and Ease of Implementation

This method would use standard and proven construction, remedial, and abatement techniques to remove hazardous building materials. This alternative is technically feasible and is easily implementable, because the project can be phased such that the hazardous building materials can be removed prior to redevelopment, thereby eliminating the exposure risk to construction workers. However, this alternative does not allow for the reuse of historically significant building components.

Risk Reduction and Green Remediation
This alternative fulfills the overall protection of human health and the environment requirement by eliminating the risk of exposure to hazardous building materials and eliminating the toxicity, mobility, and volume of the HBMs at the Site. The associated benefits are that there will be no restrictions for future construction activities and no restrictions for future users, making this a desirable alternative. This alternative will rely on the use of local contractors as well as local disposal facilities that will reduce overall fuel consumption and greenhouse gas emissions for the project.

Cost Effectiveness
Based on prior project and contractor experience and current estimates received from contractors, the estimated cost to implement this alternative is as follows:

Remedial Planning/Engineering	$ 30,000
Abatement by Removal of ACM	$500,000
Cleanup Oversight/Reporting	$ 15,000
10% Contingency	$ 54,500
Total	**$599,500**

Estimated Time to Reach Permanent Solution
Immediately following the abatement and disposal of the HBM and the receipt of any clearance sample results, the Site would meet the conditions of a permanent solution. A permanent solution could be attained within approximately three to six months of implementation.

7.3 JUSTIFICATION FOR THE SELECTED REMEDIAL ALTERNATIVE
Each of the alternatives and the comparison criteria are summarized below in **Table 1**. Based on the evaluation of the remedial alternatives presented above, the recommended alternative is Alternative #2, the full abatement and disposal of the HBM. The full abatement and disposal of the HBMs was selected because it eliminates exposure while allowing the redevelopment of the Site.

Table 1 – Summary of Remedial Alternatives for Asbestos		
Evaluation Criteria	**Alternative #1 No Action**	**Alternative #2 Full Abatement**
Effectiveness & Reliability	Not Effective or Reliable.	Removal of hazardous building materials removes the exposure pathways and has been proven to be effective and reliable forms of remediation. Long-term maintenance is not required.
Feasibility & Ease of Implementation	Not feasible but easily implementable.	Utilizes standard construction, remedial, abatement, and institutional control techniques and therefore, this alternative is technically practical and easily implementable. Historically significant building materials will not be able to be reused.
Risk Reduction & Green Remediation	No reduction in risks to human health and the environment. No reduction in contaminant mobility or toxicity. No green remediation benefits.	Risk to human health by exposure to hazardous building materials are permanently eliminated by abatement/removal.
Costs	No Cost	$600,000
Time to Reach Permanent Solution	Will not be achieved.	12 to 18 months

8.0 POSED REMEDIAL ACTION WORK PLAN

As indicated in the previous section, full abatement is the recommended alternative to address the HBMs at the Site. Impact7G will coordinate and direct the performance of the selected abatement activities. This section describes activities that will be completed as part of the Site abatement. A Health and Safety Plan for completion of these activities by Impact7G will be prepared prior to start of construction. In addition, Impact7G will present the proposed sampling strategies for review and approval by USEPA under a Site-specific Quality Assurance Project Plan (SSQAPP) prior to initiation of the project.

Asbestos Abatement

Prior to or concurrent with the demolition of the Site building, an Iowa licensed asbestos abatement contractor will remove and dispose of identified ACM pursuant to National Emissions Standards of Hazardous Air Pollutants (NESHAP) regulations. Air clearance samples will be collected from containment areas in accordance with 40 CFR Part 763 Appendix A until the testing requirements are met. Additionally, Impact7G may collect samples from additional suspect ACM encountered during demolition/abatement activities.

State and Federal Permits Required

The Site building is listed on the National Register of Historic Places. When federal funds are used on projects that will disturb historic structures or the ground associated with these structures, the State Historic Preservation Commission must review the project under Section 106 of the National Historic Preservation Act. This Section 106 review will be submitted and approved prior to commencement of cleanup work at the Site.

Remedial Action Reporting

Following the initiation of remediation activities at the Site, Impact7G will submit email status update reports to the EPA on a monthly basis. Once complete, Impact7G will prepare and submit a Remedial Action Completion Report to the EPA summarizing the field activities conducted as part of the remediation effort including all applicable disposal documentation.

9.0 SUMMARY

Impact7G developed this ABCA/RAP for the Wahkonsa Hotel building located at 908 1st Avenue South in Fort Dodge, Iowa. The purpose of this study was to evaluate potential remedial action alternatives to mitigate identified environmental conditions at the Site. Based on the findings of this study, a summary of the ABCA/RAP process is presented below:

1. Remedial action is necessary to address the ACM present within the Site building. In consideration of the Conceptual Site Model, applicable guidelines, and the nature of the specific contaminants detected, Impact7G evaluated two alternatives to identify the most appropriate cleanup. The two evaluated remedial alternatives were compared for effectiveness and reliability, feasibility and ease of implementation, risk reduction and green remediation, cost effectiveness, and estimated time to achieve a permanent solution.

2. The full abatement and proper disposal of building HBMs alternative has been selected as the recommended alternative because it meets all the evaluation criteria and is the best alternatives for the Site.
3. A remedial action work plan that details the execution the removal, abatement, and proper disposal of building HBMs is included in Section 8.

APPENDIX A

Figure 1 – Site Location Map

Site Location Map

North

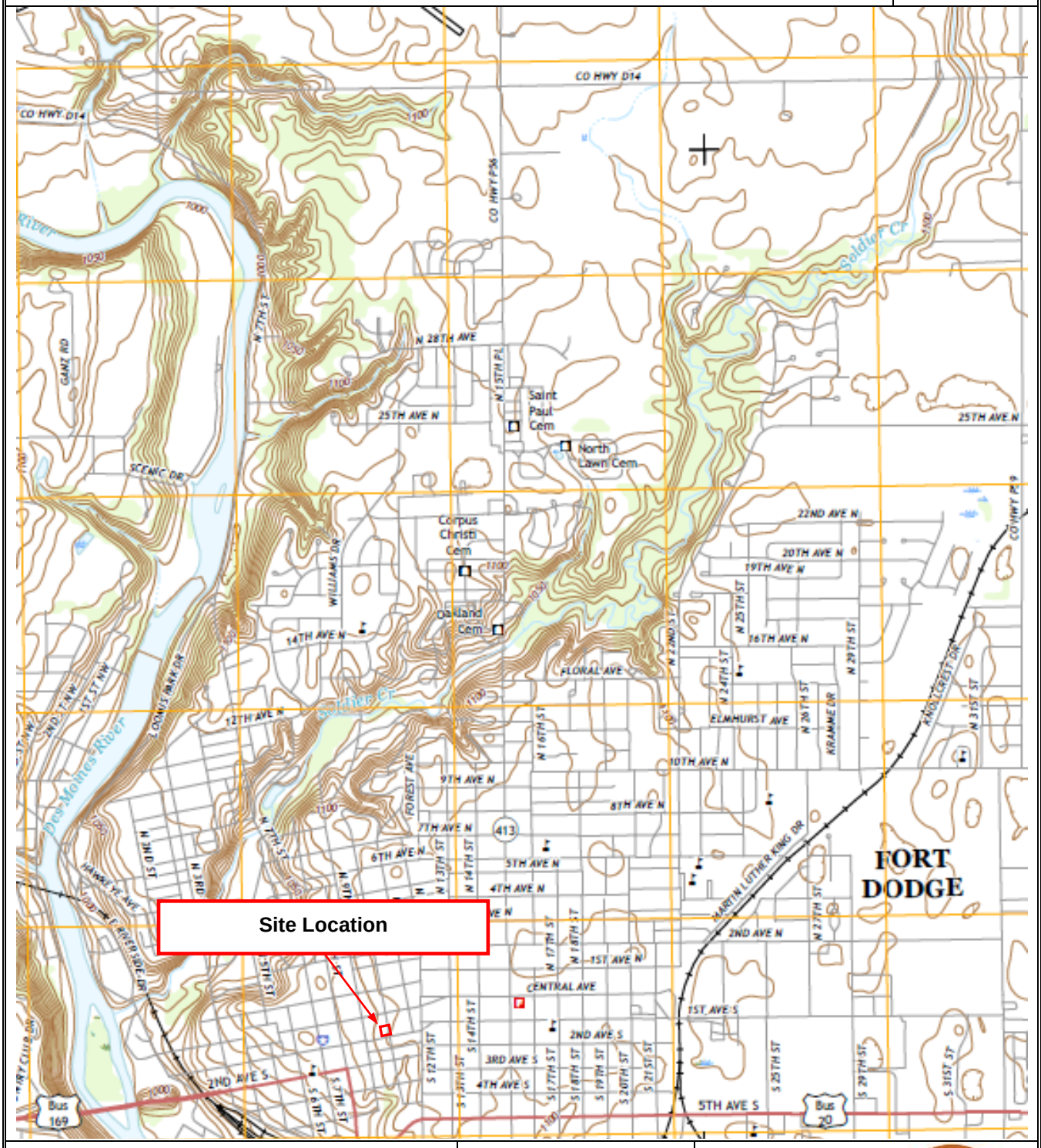

Figure 1 – Site Location Map

Wahkonsa Hotel

908 1st Avenue South
Fort Dodge, Iowa 50501

IMPACT7G

OMB Number: 4040-0004
Expiration Date: 12/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
☐ Preapplication	☒ New	
☒ Application	☐ Continuation	* Other (Specify):
☐ Changed/Corrected Application	☐ Revision	

* 3. Date Received:	4. Applicant Identifier:
01/30/2019	City of Fort Dodge, Iowa

5a. Federal Entity Identifier:	5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:	7. State Application Identifier:
	IA

8. APPLICANT INFORMATION:

* a. Legal Name:	City of Fort Dodge, Iowa
* b. Employer/Taxpayer Identification Number (EIN/TIN):	[redacted]
* c. Organizational DUNS:	0803084060000

d. Address:

* Street1:	819 1ST AVE S
Street2:	
* City:	FORT DODGE
County/Parish:	IA
* State:	IA: Iowa
Province:	
* Country:	USA: UNITED STATES
* Zip / Postal Code:	50501-7734

e. Organizational Unit:

Department Name:	Division Name:
Business Affairs & Comm Growth	

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:	Mrs.	* First Name:	Vickie
Middle Name:	Lynn		
* Last Name:	Reeck		
Suffix:			

Title:	Community & Economic Development Director
Organizational Affiliation:	City of Fort Dodge, Iowa
* Telephone Number:	515-576-4551
Fax Number:	515-573-5751
* Email:	vreeck@fortdodgeiowa.org

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

*** 12. Funding Opportunity Number:**

EPA-OLEM-OBLR-18-07

* Title:

FY19 GUIDELINES FOR BROWNFIELDS CLEANUP GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Remediation of environmental contaminants at the former Wahkonsa Annex.

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: 4th

* b. Program/Project: 4th

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 11/01/2019

* b. End Date: 06/01/2020

18. Estimated Funding ($):

* a. Federal	500,000.00
* b. Applicant	100,000.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	600,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Mr.

* First Name: Matt

Middle Name:

* Last Name: Bemrich

Suffix:

* Title: Mayor

* Telephone Number: 515-576-4551

Fax Number:

* Email: mbemrich@fortdodgeiowa.org

* Signature of Authorized Representative: Vickie L Reeck

* Date Signed: 01/30/2019